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6 Attorneys for Defendants  
7 McCORMICK & SCHMICK RESTAURANT CORP.;  
8 McCORMICK & SCHMICK'S SEAFOOD  
9 RESTAURANTS, INC.; and LANDRY'S, INC.

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11 Un Kei Wu(SBN 270058)  
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15 Attorneys for Plaintiff  
16 MAUDELLE MITCHELL

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA

19 Maudelle Mitchell,

Case No.: C 14-04974 RS

20 Plaintiff,

21 **STIPULATION AND [PROPOSED] ORDER**  
**CONTINUING DEADLINE FOR**  
**COMPLETION OF MEDIATION**

22 v.

23 McCormick & Schmick's Seafood  
24 Restaurants, Inc., Landry's Inc., and DOES 1-  
25,

26 Complaint filed: August 29, 2014  
27 Trial Date: January 19, 2016

28 Defendants.

1 Plaintiff MAUDELLE MITCHELL ("Plaintiff") and Defendants McCORMICK &  
2 SCHMICK RESTAURANT CORP., McCORMICK & SCHMICK'S SEAFOOD,  
3 RESTAURANTS, INC., and LANDRY'S, INC. ("Defendants"), by and through their  
4 respective undersigned attorneys, hereby stipulate and agree to continue the deadlines for  
5 the parties to complete mediation in this matter.

6  
7 WHEREAS, on November 10, 2014, Defendant removed this matter to this  
8 Court from the Alameda Superior Court based on Diversity Jurisdiction;

9  
10 WHEREAS, on February 19, 2015, the parties attended an Initial Case  
11 Management Conference;

12  
13 WHEREAS, on February 19, 2015, the Court issued a Case Management  
14 Order setting the last day for the parties to hold mediation of this matter on June 19, 2015;

15  
16 WHEREAS, on March 16, 2015, the Court filed a Notice of Appointment of  
17 Mediator of JoAnne Dellaverson;

18  
19 WHEREAS, Ms. Dellaverson is on vacation and unavailable for most of the  
20 month of June;

21  
22 WHEREAS counsel for the parties have conferred and all parties have agreed  
23 to have the mediation on July 23, 2015;

24  
25 WHEREAS, trial of this matter is not scheduled until January 19, 2016, and the  
26 July 20 mediation date will have no impact on the trial date or any other pre-trial dates;

1 NOW, THEREFORE,

2  
3 IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs and  
4 Defendant, by and through their respective undersigned attorneys of record, to continue the  
5 last date to complete mediation from June 19, 2015 to July 31, 2015.

6  
7 Good cause exists for this continuance of the existing date of the Court's  
8 Order for the reasons set forth above.

9  
10 **IT IS SO STIPULATED.**

11  
12 Dated: March 31, 2015

LIBERATION LAW GROUP

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15 By: /s/ Arlo Garcia Uriarte

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17 Arlo Garcia Uriarte  
18 Un Kei Wu  
19 Ernesto Sanchez  
20 Brent A. Robinson  
21 Attorneys for Plaintiffs  
22 MAUDELLE MITCHELL

23  
24 Dated: March 31, 2015

MILLER LAW GROUP  
A Professional Corporation

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26 By: /s/ Janine S. Simerly

27 Janine S. Simerly  
28 Attorneys for Defendants  
McCORMICK & SCHMICK RESTAURANT  
CORP.; McCORMICK & SCHMICK'S  
SEAFOOD RESTAURANTS, INC.; and  
LANDRY'S, INC.

1 [PROPOSED] ORDER  
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3

4 Having reviewed the Stipulation executed by Plaintiff MAUDELLE MITCHELL  
5 and Defendants McCORMICK & SCHMICK RESTAURANT CORP., McCORMICK &  
6 SCHMICK'S SEAFOOD, RESTAURANTS, INC., and LANDRY'S, INC., and good cause  
7 appearing, the Court hereby orders that:

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- 9 • The deadline for the parties to complete the mediation of this matter  
through the Northern District ADR program is hereby continued from  
June 19, 2015 to July 31, 2015.

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11 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

12 Dated: 4/1/15

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14   
Hon. Richard Seeborg  
District Judge

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